

FISHER & PHILLIPS LLP
3200 N. Central Avenue, Suite 1550
Phoenix, Arizona 85012-2487
(602) 281-3400

Allison L. Kheel, NV Bar No. 12986
FISHER & PHILLIPS LLP
300 S. Fourth Street, Suite 1500
Las Vegas, Nevada 89101
Telephone: (702) 862-3817
Fax: (702) 252-7411
akheel@fisherphillips.com

Pavneet Singh Uppal, AZ SBN 016805 (*Admitted Pro Hac Vice*)
Kris Leonhardt, AZ SBN 026401 (*Admitted Pro Hac Vice*)
Nermana Grinnan, AZ SBN 035240 (*Admitted Pro Hac Vice*)
FISHER & PHILLIPS LLP
3200 N. Central Avenue, Suite 1550
Phoenix, Arizona 85012-2487
Telephone: (602) 281-3400
Fax: (602) 281-3401
puppal@fisherphillips.com
kleonhardt@fisherphillips.com
ngrinnan@fisherphillips.com
*Attorneys for Defendants, Counterclaimant,
And Third Party Plaintiff*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE
MEMORIAL HOSPITAL, INC. (doing business
as “Sage Memorial Hospital”); an Arizona non-
profit corporation

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company (doing
business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO
EXTEND TIME FOR
DEFENDANTS TO ANSWER
PLAINTIFF’S THIRD AMENDED
COMPLAINT [ECF NO. 192]**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-
1 and subject to this Court’s approval, that Defendants Razaghi Development Company,
LLC, Ahmad Razaghi, and Tausif Hasan (collectively “Defendants”) shall have an
extension of time up to and including **April 14, 2023** (two weeks) to respond to Plaintiff’s

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Third Amended Complaint (ECF No. 192) filed on May 20, 2022. On January 30, 2023, the Court issued its Ruling on Defendants' Motion to Dismiss the Third Amended Complaint (ECF No. 232), partially granting said motion and triggering the deadline for response.

The parties stipulate that there is good cause for the requested extension due to defense counsels' current case load including Mr. Uppal's upcoming trial in another matter (April 3, 2023 through April 6, 2023), Defendants' availability to assist in preparing the response and the other currently pending deadlines in this matter. This includes the multiple recent filings and responses necessary in this case over the last three weeks. As this court is aware, this matter involves a Third Amended Complaint that is 132 pages, with 278 numbered paragraphs plus an additional 80 pages of subparts. Due to the reasons stated herein, Defendants require additional time to prepare their response thereto. This is the second request to extend Defendants' deadline to respond to the Third Amended Complaint following the Court's Ruling on the Motion to Dismiss (ECF No. 232).

This request is made in good faith and not for the purpose of delay. Neither party will be prejudiced by the requested extension.

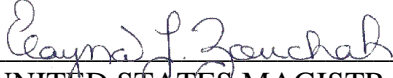
For the reasons set forth above, the parties ask the Court to approve this stipulation and allow Defendants up to and including **April 14, 2023** to respond to or otherwise answer the Third Amended Complaint (ECF No. 192).

RESPECTFULLY SUBMITTED this 30th day of March 2023.

/s/ D. Samuel Coffman (with permission)
Justin J. Bustos, Esq.
D. Samuel Coffman, Esq.
Counsel for Plaintiff and Counterdefendant

/s/ Kris Leonhardt
Pavneet Singh Uppal, Esq.
Kris Leonhardt, Esq.
Nermana Pehlic, Esq.
Jeffrey D. Winchester, Esq.
*Counsel for Defendants,
Counterplaintiffs, and Third-Party
Plaintiffs*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE
Dated: March 30, 2023